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April 21, 2016

VIA ELECTRONIC AND U.S. MAIL

Regional Freedom of Information Officer  
US EPA Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3507  
R5foia@epamail.epa.gov

Re: Freedom of Information Act Request

Dear Sir or Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, and 40 CFR Part 2, Bricker & Eckler, LLP is submitting the following Freedom of Information Act ("FOIA") request for the inspection and copying of the records identified below.

Documents are requested in electronic form or such form as they are retained by US EPA. Bricker & Eckler agrees to pay for the costs incurred by US EPA in responding to this request pursuant to FOIA and US EPA policy, not to exceed \$1,000. Please contact me at the above address or telephone number should costs be estimated to exceed this amount.

Bricker & Eckler requests documents in the possession of US EPA Region 5 pertaining to the following site (the "Site"):

Name of Facility/Company: The South Dayton Dump and Landfill Site

Address: 80 acres located at 1975 Dryden Road (also known as Springboro Pike), Moraine, Ohio

County: Montgomery County, Ohio

EPA ID: EPA ID # OHD980611388

For the purpose of this FOIA request, the documents sought include all original writings of any nature and all non-identical copies thereof, including, but not limited to: contracts; agreements; memoranda; correspondence; invoices; acknowledgments; records of conversations; communications; electronic mail messages; reports; investigations; studies; summaries; surveys; meeting minutes; handwritten notes; agendas; announcements; charts; graphs; tables; calculations; manuals; guidance; telephone logs; photographs; scientific studies; sampling plans; and laboratory results.

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This request seeks all documents in the possession of US EPA concerning environmental contamination at the Site for the approximate time period of 1941-present. This includes, but is not limited to, documents pertaining to:

- US EPA's investigation of the Site;
- US EPA's findings regarding environmental contamination at the Site;
- Known sources of contamination at or near the Site;
- Potential or suspected sources of contamination at or near the Site;
- Contamination of: the soil on and around the Site; the groundwater under or near the Site; and/or the Great Miami River that is suspected or known to originate from the Site;
- Any action(s) taken by US EPA relating to the Site pursuant to the Clean Water Act; the Comprehensive Environmental Response, Compensation and Liability Act; the Resources Conservation and Recovery Act; or any other federal or state statute, regulation, law, or rule governing pollution control;
- Negotiations with potentially responsible parties pertaining to study or cleanup of the Site;
- Parties known or investigated by US EPA to have involvement with the Site, including but not limited to: Jim City Salvage; Ottoson Solvents; Doyle's Auto Salvage; the Miami Conservancy District; Ronald Barnett; Margaret C. Grillo; Kathryn A. Boesch; Horace Boesch; Roxie Boesch; Cyril J. Grillo; Ruby Grillo; General Motors Corporation; Hobart Corporation; NCR Corp.; Waste Management of Ohio, Inc.; The Bimac Corp.; Cargill, Inc.; The Dayton Power & Light Co.; Valley Asphalt Corp.; IRG Dayton I, LLC; Kelsey-Hayes / Dayton Walter / Waltham Foundry / Moraine Manufacturing; Bridgestone / Dayton Tire & Rubber Co.; Con Agra / McCall's; Monsanto / Pharmacia; Franklin Iron & Metal; City of Dayton; Cox Media / Dayton Daily News / Dayton Journal Herald; Dayton Industrial Drum; Sherwin Williams; Newmark (fka Van Dyne-Crotty); Flowserve / Durion; Kimberly-Clark; Van Dyne Crotty; PPG; Coca-Cola; Peerless; Harris; DAP and LaMiranda (fka DAP);
- Wastes disposed of at the Site and the parties that allegedly disposed of said wastes and/or transported said wastes to the Site; and
- Activities or investigations related to any and all "owners" or "operators" of the Site.

Please do not hesitate to contact me should you have any questions. Thank you in advance for your assistance with this matter.

Sincerely yours,



Christine Rideout Schirra